

Content of the Request for DOE Approval of Documented Safety Analysis (DSA) Alternate Methodologies (Other than the “Safe Harbors”)

In the request for DOE approval of an alternate methodology used or to be used in DSA preparation, the contractor should:

1. Provide basic information
 - 1.1 Operations/Field/Area Office
 - 1.2 Facility
 - 1.3 DSA identifier/title
 - 1.4 Hazard Category
 - 1.5 Facility type, per 10 CFR 830, Subpart B, Appendix A, Table 2
 - 1.6 Facility remaining operational life
 - 1.7 The DSA history:
 - DSA was issued on
 - DSA was upgraded/streamlined on
 - Last update was approved by DOE on
 - DSA is new or it is Preliminary DSA.
2. Identify the “safe harbor” or parts of the “safe harbor” which are replaced by the alternate methodology.
3. Describe the alternate methodology.
4. Describe the extent of peer/independent review of the proposed methodology and provide the results of the review(s).
5. Identify if the replacement is permanent or temporary (e.g., the alternate methodology is to be used until the DSA can be rewritten using a “safe harbor”).
6. Identify specific activities that would be necessary to implement the methodology that is replaced.
7. Discuss special circumstances that warrant the use of the alternate methodology.
8. State what benefit is realized by not using the corresponding “safe harbor”.
9. Show how the alternate methodology will result in a safety basis equivalent to that which would result from the use the “safe harbor” methodology.
10. Show how the alternate methodology satisfies the rule requirements and the guidance in the rule Implementation Guides.
11. Identify and justify the date by which the decision on the alternate methodology must be made to prevent or minimize impacts on safety, operations, or mission.